



WASHINGTON STATE SHERIFFS' ASSOCIATION

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October 14, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Room TW-A325
Washington, DC 20554

Re: *Ex Parte* Communication
 WC Docket No. 12-375; Inmate Calling Services (ICS)

Dear Ms. Dortch:

The Washington State Sheriffs' Association hereby files an *ex parte* communication in connection with the above-referenced proceeding. The purpose of this filing is to submit additional information in support of NSA's position that Sheriffs must be allowed to recover their costs if ICS services are to continue to be widely available in jails, and to urge the Commission to provide a reasonable transition period for jails.

The Washington State Sheriffs' Association agrees with the comments and reply comments filed by the National Sheriffs' Association in this proceeding, and urges the Commission to conform its actions consistent with the recommendations of the National Sheriff's Association.

The Washington State Sheriffs' Association further emphasizes the following points:

1. The Washington State Sheriffs' Association does not believe the Commission has jurisdiction over interstate calling services;
2. The Washington State Sheriffs' Association does not believe the Commission has jurisdiction over online calling services;
3. The Washington State Sheriffs' Association does not believe the Commission's recommended rates for ICS would effectively cover the costs of such services, and that such a rate structure, if implemented, would jeopardize the viability of the ICS market and leave many jails without the ability to provide calling services to their inmates; and
4. The Washington State Sheriffs' Association believes that the Commission's proposed 90 day implementation period is unreasonable, and would recommend a transition period not less than two years.

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If you have any questions, please do not hesitate to contact me.

Respectfully Submitted,



Gene Dana, Sheriff, Kittitas County Sheriff's Office
President, Washington State Sheriffs' Association

GD:dg

cc: National Sheriffs Association
U. S. Senator Patty Murray
U. S. Senator Maria Cantwell
U. S. Congresswoman Suzan DelBene
U. S. Congressman Rick Larsen
U. S. Congresswoman Jamie Herrera Buetler
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